

IN THE UNITED STATE DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

AMERICA FIRST LEGACY PAC,  
*Plaintiff,*  
v.  
ANGIE WONG  
(a.k.a. ANGIE WONG SIE YING),  
*Defendant.*

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CIVIL ACTION FILE  
NO: 3:23 cv 208 TCB

AMENDED PETITION FOR TORTIOUS INTERFERENCE WITH  
BUSINESS, DEFAMATION/LIBEL, CONVERSION OF PROPERTY,  
TROVER, TEMPORARY PROTECTIVE ORDER/INJUNCTION, AND  
ATTORNEY'S FEES

COMES NOW the Plaintiff, **America First Legacy Political Action Committee**, is a tax exempt organization established under 26 U.S.C. § 527 of the Internal Revenue Code and as defined by O.C.G.A. §§ 21-5-3(20), 21-5-30.2 located within Georgia, herein file this *Amended Petition for Tortious Interference with Business, Defamation/Libel, Conversion of Property, Trover, Motion for Immediate Temporary Protective Order/Injunction, and Attorney's Fees*, pursuant Federal Rule of Civil Procedure Rule 15, for cause seeking compensatory and punitive damages in addition to equitable injunctive relief against **Angie Wong**, Defendant herein, and in support thereof shows the Court the following:

## Jurisdiction and Venue

1.

The Plaintiff, America First Legacy Political Action Committee (hereinafter “Legacy PAC”) is a political action committee with its principal office and headquarters located within State of Georgia, and is therefore entitled to bring this action. Plaintiff headquarters and principal place of business is located at 20 Baker Road, Suite 5, Newnan, Georgia 30265.

## Personal Jurisdiction Over Non-Residents of Georgia

2.

Defendant, Angie Wong, is a current resident of the State of Florida, and is believed to reside at 68 SE 6<sup>th</sup> Street, Apt. 3904, Miami, Florida 33131-3518. Although Wong is a resident of the State of Florida, she is subject to the personal jurisdiction of the State of Georgia pursuant to **O.C.G.A. §9-10-91**. Wong’s misconduct alleged herein is directly related to her misconduct as the prior president of Legacy PAC. Wong has committed several tortious acts against Legacy PAC that is located in this State.

## Subject Matter Jurisdiction

3.

Pursuant to **O.C.G.A. § 15-6-8(2)**, subject-matter jurisdiction is proper in this Court as the Superior Court of Coweta County is the court of equity. Legacy PAC is seeking equitable injunctive relief in addition to compensatory and punitive damages.

#### Venue

4.

Venue is proper in the Superior Court of Coweta County due to the Plaintiff PAC headquarters and principal place of business is located at 20 Baker Road, Suite 5, Newnan, Georgia 30265, an address located within the boundaries of the Coweta Judicial Circuit and Coweta County.

#### Factual Background

5.

Legacy PAC was organized under **26 U.S.C. § 527** of the Internal Revenue Code, the laws of the State of Georgia, **O.C.G.A. §§ 21-5-3, 21-5-30.2** and is registered with the Georgia Secretary of State's Office with a formation date of October 5, 2022. Plaintiff Corporation operates out of its headquarters and principal place of business located at 20 Baker Road, Suite 5, Newnan, Georgia 30265. Legacy PAC was organized and started

with the founding members, Jared Craig, Esq., Stan Fitzgerald, and Angie Wong. Wong was named as the initial Legacy PAC President.

Legacy PAC is a conservative republican organization and part of the Donald J. Trump Campaign Coalition through a partnership with the Center for Renewing America. Legacy PAC was formed to promote vetted federal Republican candidates seeking federal legislative offices. Legacy PAC is relatively new on the political stage, but has gotten a substantial amount of respect in national politics due to its up-front and transparent protocols. Additionally, Legacy PAC has sponsored several bus tours promoting America First Candidates across the United States. Following the November 8, 2022 general elections, Wong was directed to make all Legacy PAC information available to Jared Craig and Wong agreed to do so.

Legacy PAC had its kickoff event on March 3, 2023 during CPAC week in Washington D.C at the University Club of Washington D.C. It was discovered during this event that Wong was not capable of organizing an event, nor capable of running Legacy PAC. Wong over-promised her abilities to operate as president. Wong had not created bylaws for Legacy PAC as is required, and she failed to share any account information with



anyone until May 28, 2023. Upon initial examination, Jared Craig noticed several questionable transactions on the Legacy PAC bank statements; one of which was a payment made to the University Club of Washington D.C. that caused an overdraft. And, there were three (3) refunds to the Legacy PAC Account from the University Club of Washington D.C. When Wong was confronted with these inquiries, no explanations were given. Wong requested Fitzgerald's personal credit card to cover the cost of the March 3, 2023 kickoff event although she claimed to have sold several VIP tickets.

It was also discovered that Wong had received a large donation in the amount of \$20,000.00, and prior to the transaction being complete, payment was stopped by the drafter. No clear explanation was given as to why this donation was stopped. Wong had previously promised that she could generate substantial fundraising donations, but failed to deliver. For all of these reasons, Legacy PAC members did not believe Wong was the best fit due to her inability to operate properly

Further investigation into the Legacy PAC bank account, it was discovered that Wong redirected the fundraising portals, Anedot, WinRed, and Stripe, to some other deposit account other than the known Legacy PAC bank account held with Security Bank and Trust Company. Wong

claimed to have held several events which she claimed were “sold out”, yet the bank statements didn’t reflect any deposits. For these reasons, Legacy PAC sent notice of an Emergency Board of Directors Meeting on May 28, 2023 to be held on May 30, 2023 to discuss these matters with Wong. Wong summarily stated that she would not attend the meeting and failed to offer a time and date in which she would be available. The remaining members of Legacy PAC, Jared Craig and Stan Fitzgerald held the Emergency Board of Directors Meeting on May 30, 2023 via a recorded Zoom video conference and Wong failed to attend after being given 48 hours prior notice. Wong was voted out of Legacy PAC at the May 30, 2023 Emergency Board of Directors Meeting. A copy of the minutes and the video recording was made available to Wong shortly after she was voted out. The Legacy PAC Treasurer, Troy Brewer was informed of the removal of Wong, and the Legacy PAC bank account was secured to prevent Wong from future interference.

In an attempt to keep the conflicts contained herein out of the public, Legacy PAC offered Wong several offers for her to save face and to continue in her paid public commentary efforts. Wong defiantly claimed that she was in-fact the Legacy PAC President. Wong refused to transfer

Legacy PAC assets including the website, donation portals and social media accounts to Jared Craig, current President of Legacy PAC. Since being voted out of Legacy PAC, Wong has systematically defamed the organization, individual members, and known associates on the Legacy PAC social media accounts and website. Wong hired an attorney to negotiate the conflicts herein, and Legacy PAC operated in good faith to remove truthful and factual website news pages and social media posts, yet Wong failed to take down any of her false and defamatory statements online. Although Legacy PAC operated in good faith to resolve these matters amicably, Wong increased the frequency and severity of her online allegations against Legacy PAC and its members.

Legacy-PAC.org was the prior site that Wong refuses to relinquish control and use. Plaintiff was forced to start a completely new website, LegacyPAC.org due to Wong's wrongful control and possession of the prior website. What is troubling, is that the donation links contained on the site controlled by Wong are not connected to any legitimate Legacy PAC deposit account. Additionally, Wong exposed Legacy PAC to criticism for her unauthorized use of photographs of Kari Lake with John



Fredericks on the rogue site. This rogue website is still in the wrongful control and possession of Wong. Wong continues to control Legacy PAC

Legacy PAC continued to promote conservative Republican Candidates after Wong's May 30, 2023 removal and made endorsement of those deserving its support. Wong refused to relinquish control over the Verified Facebook and Twitter (now "X") social media accounts and continued to use these rogue accounts to defame and besmirch Legacy PAC and its remaining members. Wong has accused Legacy PAC as being a monetized PAC and that Craig and Fitzgerald were acting fraudulently and misleading the public. Wong accused Legacy PAC members as grifters, con men, fraudsters, and scammers although Craig nor Fitzgerald ever received \$1.00 from any Legacy PAC account. Wong accused Craig and Fitzgerald as being White Supremacists. Wong was the only member requesting a salary from Legacy PAC. Wong systematically caused Fitzgerald and Craig to cover Legacy PAC expenses out of their personal funds. Wong's misinformation became wide-spread quickly as she would make daily posts on social media making false allegations and malicious accusations against Legacy PAC. Wong escalated her appearances (paid-for air time) on various cable new shows on One America News Network,



Real America's Voice, and Newsmax misrepresenting herself as the Legacy PAC President up to the date of this filing, although she was voted out of Legacy PAC on May 30, 2023.

Wong's malicious withholding of the Legacy PAC website, social media and fundraising portals have caused Legacy PAC to lose potential donors and continues to prevent it from operating properly. Wong is intentionally making false statements concerning Legacy PAC and its members on a site that she purports to be the official Legacy PAC website. Wong is interfering with Legacy PAC operations out of spite and for improper purposes.

Legacy PAC now seeks the assistance of this Court to preserve the Legacy PAC assets in the wrongful control and possession of Wong and is asking for immediate injunctive relief to prohibit any destruction or further defamatory statements from Wong.

Legacy PAC now seeks compensatory and punitive damages, separate and in addition to injunctive relief to prevent additional future harm and an award of attorney's fees and litigation expenses. In support of the relief sought herein, Legacy PAC states as follows:

## STATEMENT OF CLAIMS

### COUNT 1: UNLAWFUL INTERFERENCE WITH EMPLOYER'S

#### **BUSINESS**

6.

Pursuant to O.C.G.A. § 34-6-4, "*It shall be unlawful for any person by the use of intimidation to prevent or attempt to prevent any [business entity] from lawfully engaging in any lawful business activity; from lawfully, or peaceably using or enjoying his property used or useful in the conduct of such business.*" (Emphasis Added).

7.

The elements of tortious interference with contractual relations, business relations, or potential business relations are:

1. Improper action or wrongful conduct by the defendant without privilege;
2. The defendant acted purposely and with malice with the intent to injure;
3. The defendant induced a breach of contractual obligations, or caused a party or third parties to discontinue or fail to enter into an anticipated business relationship with the plaintiff; and

4. The defendant's tortious conduct proximately caused damage to the plaintiff." *Tribeca Homes, LLC v. Marathon Investment Corp. et al.*, 322 Ga.App 596 (2013).

### *Stranger Doctrine*

8.

To establish under the first element that the defendant acted "without privilege," the plaintiff must show that the defendant was a stranger to the contract or business relation at issue. Under the "Stranger Doctrine", only a stranger to both the contract at issue and the business relationship giving rise to and underpinning the contact may be liable. *Mabra et al. v. SF INC. et al.*, 316 Ga.App. 62 (2012).

### *Wong's Conduct Was Not Privileged Activity*

9.

In this case, Defendant Wong was voted out as President of Legacy PAC at an Emergency Board Meeting on May 30, 2023, and no further activity after that date would be privileged. Wong wrongfully retained sole and exclusive access and control over Legacy PAC social media accounts, fundraising portals and the official Legacy PAC website at that time, [www.Legacy-PAC.org](http://www.Legacy-PAC.org). Wong's misconduct is the wrongful retention

of access and control after she was no longer associated with Legacy PAC in any way whatsoever. Wong has refused to relinquish access and control of social media, fundraising portals and websites of Legacy PAC as of the date of this filing.

*Wong Acted with Intent to Injure and Malice*

10.

Wong's wrongful retention of Legacy PAC social media accounts, fundraising portals, and official website were intentional acts after she was removed from Legacy PAC on May 30, 2023. Wong illustrated her malicious intent to injure Legacy PAC by using the various platforms to publicly claim that she was still in-fact the Legacy PAC President following her removal. When Legacy PAC made a formal demand to cease and desist her unauthorized use of Legacy PAC accounts, Wong continued to false and defamatory public statements about the remaining members of Legacy PAC. Wong misused the official Legacy PAC website to create chaos without proper authority after May 30, 2023. Wong altered the website in her sole control to include photographs on the home page of various public figures and media personalities without their consent to mislead the public concerning the associations of Legacy PAC. Wong also



maintains donation portal pages on the site supposedly in the name of Legacy PAC, but said portal is not directing any payments to the Legacy PAC bank account. Wong is misusing the Legacy PAC assets to create disruption in fundraising activities, and potentially solicit illegal donations. Although Legacy PAC has created a new website, [www.LegacyPAC.org](http://www.LegacyPAC.org) (no hyphen), the public at large is confused when both websites appear in search engines.

*Interference with Contractual Obligations or Potential Business*

11.

Wong's continued unauthorized use of Legacy PAC accounts and assets has interfered with its fundraising activities. Wong has the sole and exclusive access and use of WinRed, Anedot, and Stripe public online donation portals. Legacy PAC has ongoing contractual relationship with fundraising independent contactors and firms that require said portals. Wong's unauthorized control and use of Legacy PAC fundraising portals has interfered with Legacy PAC's ability to raise funds and has caused apprehension with donors because the preferred portals are not available. Legacy PAC cannot simply open new fundraising portals and continue to

operate because the firms that manage the portals verify the client and only allow one account per client.

12.

Wong's continued unauthorized use of Legacy PAC social media and online accounts continues to interfere with its fundraising activities by creating chaos and confusion. Wong has the sole and exclusive access to the Legacy PAC's WinRed, Anedot, and Stripe public online donation portals. Legacy PAC has ongoing contractual relationships with fundraising independent contractors and firms that require said portals to operate. Wong's unauthorized control and use of Legacy PAC fundraising portals as interfered with Legacy PAC's ability to raise funds. Wong's efforts to create chaos is causing apprehension with donors because the preferred portals are not available. Legacy PAC cannot simply open new fundraising portals and continue to operate because the firms that manage the portals verify the client and only allow one account per client. Wong is sabotaging Legacy PAC public relations and fundraising activities.

13.

As recently as August 21, 2023, Wong again published false and defamatory statements and images on social media indicating that one of

Legacy PAC's close associates, Veterans for Trump, is "FAKE", and therefore not a legitimate organization. A copy of this post is attached hereto as Exhibit "B". Stan Fitzgerald is the National President of Veterans for Trump and he sits on the Board of Directors of Legacy PAC. It is clear that Fitzgerald is authorized to promote an organization where he is the National President. The event illustrated in Wong's post was a fundraising dinner in Atlanta hosted by Veterans for Trump for Congresswoman Lauren Boebert of Colorado. Wong's post is clearly an effort to interfere with Legacy PAC's fundraising effort for Congresswoman Boebert.

*Wong's Misconduct is the Proximate and Actual Cause of Damages*

14.

Wong's misconduct illustrated herein are the direct and proximate cause of Legacy PAC damages. Wong's withholding of access and control of the official Legacy PAC website is the direct and proximate cause of Legacy PAC requiring a new website to be created at a cost of \$2,500.00. Wong's unauthorized and wrongful retention of the online fundraising portals is the direct cause of lost online public donations and direct solicitations. Wong's efforts to defame Legacy PAC and its remaining members are the direct or proximate cause of its public image being

tarnished. Legacy PAC has expended approximately \$10,000.00 in local and national press releases to mitigate the impact of Wong's misconduct. Legacy PAC has expended \$10,000.00 in fundraising vendor contracts that were materially impacted by Wong's wrongful withholding of donation portals. Legacy PAC members are constantly fielding questions from the public concerning Wong's misconduct and defamatory statements. Legacy PAC is seeking a total of \$22,500.00 in compensatory damages herein.

**COUNT 2: DEFAMATION/LIBEL**

15.

Legacy PAC restates the averments contained in paragraphs 1 through 14 above as if restated verbatim herein below.

***Libel Statutory Law***

16.

Pursuant to O.C.G.A. §51-5-1, "A *libel is a false and malicious defamation of another, expressed in print, in writing, pictures, or signs, tending to injure the reputation of the person and exposing him to public hatred, contempt, or ridicule.*" (Emphasis Added). And, pursuant to O.C.G.A. §9-3-33, actions for damage to one's reputation shall be brought within one (1) year after the right of action accrues.



### *Elements of Libel*

17.

*“To establish a viable claim sounding in defamation a plaintiff must plead and prove the following four elements: “*

- 1. a false and defamatory statement concerning the plaintiff;*
- 2. an **unprivileged** communication to a third party;*
- 3. **fault by the defendant** amounting at least to negligence; and*
- 4. **special harm** or the actionability of the statement irrespective of special harm.” (Emphasis Added).*

*Smith v. DiFrancesco*, 341 Ga. App. 786, 787–88, 802 S.E.2d 69, 72 (2017), cert. denied (Dec. 11, 2017); *Wertz v. Allen*, 313 Ga. App. 202, 205, 721 S.E.2d 122, 126 (2011).

### *Facts not Opinions Actionable*

18.

*“Although as a general rule the question whether a particular communication is defamatory is for the jury, if the statement is not ambiguous and reasonably can have only one interpretation, the question of defamation is one of law for the court.” *Speedway Grading Corp. v. Gardner*, 206 Ga. App. 439, 441, 425 S.E.2d 676, 678 (1992).*

19.

*“In order to satisfy the first element, the alleged defamatory statement must be shown to be false, and, as such, “a defamation action will lie only for a statement of fact” since “an opinion or subjective assessment, as to which reasonable minds could differ, cannot be proved false.”* **Cottrell v. Smith**, 299 Ga. 517, 523, 788 S.E.2d 772, 781 (2016).

***Defamation/Libel Per Se***

20.

*“Under Georgia law, statements that tend to injure one in his trade or business are libelous per se.”* **StopLoss Specialists, LLC v. VeriClaim, Inc.**, (2018).

***Defamatory Statements Published***

21.

Following Wong’s involuntary removal from Legacy PAC President on May 30, 2023, Wong began to make false and defamatory affirmative statements concerning Legacy PAC and its members in public and therefore, in writing, via social media accounts and website. Wong published the following defamatory statements within one (1) year prior to filing this action:

- **Exhibit “C”:** Twitter Post: *“Biden was right to say we do have a **White Supremacy** problem in the #Republican party. Aremy **ex-partners** accusing me of being connected in any way to the CCP...?”*;
- **Exhibit “D”:** Twitter Post: *“When I discovered my **former partners** and associates were involved in alleged **fraudulent activities**, I reported it to my lawyers and the authorities under oath and punishable by laws of perjury. Rich that these **scammers** are now accusing me of the crimes they’re being ...”* (Emphasis Added).

22.

In response to Wong’s Twitter Post identified as Exhibit C above, Legacy PAC merely published a photograph of Wong that was discerned as one of her public images. A copy of this image is attached hereto as **Exhibit “E”**. When this photograph was discovered, it was shocking to see someone who purported to be a staunch Conservative Republican posing proudly in front of a portrait of Chairman Mao Zedong, a Communist/Socialist. Wong published this image herself on social media, and Legacy PAC merely discovered it.

### ***Defamation Damages***

23.

Wong's false and defamatory statements illustrated above have caused substantial delays in the operation of Legacy PAC fundraising and caused them to expend a substantial amount of time and effort to mitigate Wong's intentional misconduct and mischaracterizations of Legacy PAC. Legacy PAC is now seeking \$50,000.00 in amended compensatory damages for the defamation of Legacy PAC and punitive damages as this Court or its finders of fact deems just and appropriate.

**COUNT 3: CONVERSION/TROVER OF LEGACY PAC PROPERTY**

24.

Legacy PAC restates the averments contained in paragraphs 1 through 23 above as if restated verbatim herein below.

25.

Pursuant to O.C.G.A. § 44-12-150, "*In actions to recover the possession of chattels, it shall not be necessary to prove any conversion of the property if the defendant is in possession when the action is brought.*"

26.

*"A person commits theft by conversion when having **lawfully obtained** property of another under agreement to make specified disposition of such property he **knowingly converts property to his own use** in violation of such*



agreement.” *Lewis v. State*, 150 Ga.App. 791, (1979). (Emphasis Added).

“The presence of fraudulent intent distinguishes criminal theft by conversion from a breach of contract. *Terrell v. State*, 275 Ga.App. 501, (2005).

27.

“Wherever there is a conversion, trover is the remedy; and, as against a wrongdoer, possession will be held to be conclusive evidence of such general or special property in the personalty as is essential to maintain trover.” *Roper Wholesale Grocery Co. v. Favor*, 8 Ga. App. 178, 68 S.E. 883, 883 (1910). (Emphasis Added).

28.

Wong initially obtained possession of the Legacy PAC website, social media accounts and fundraising portals while she was the acting Legacy PAC President, but her continued possession, exclusive access and control following her removal on May 30, 2023 through the date of this filing were unauthorized. From May 30, 2023 through the date of this filing, Wong has refused to relinquish her possession, access and control of Legacy PAC assets and transfer all rights of possession and use back to Legacy PAC. Wong currently uses the social media accounts to defame and create chaos for Legacy PAC. Wong currently maintains an unauthorized website,

www.Legacy-PAC.org, and continues to publish false and misleading statements and photographs. Wong currently holds the sole and exclusive control over fundraising portals in the name of Legacy PAC and includes these portals on the unauthorized website. Wong's continuous and unauthorized use of Legacy PAC social media accounts, unauthorized website, and fundraising portals are for her own illicit and malicious purposes contrary to the benefit of Legacy PAC.

29.

Legacy PAC is seeking an immediate injunction herein below as the primary remedy, in addition to compensatory damages, to cure the ongoing unauthorized use of Legacy PAC website, social media accounts, and fundraising portals, and in addition to preventing her future use, that she immediately transfers any and all access and control of those accounts to Legacy PAC.

**COUNT 4: MOTION FOR IMMEDIATE/TEMPORARY INJUNCTIVE RELIEF**

30.

Legacy PAC restates the averments contained in paragraphs 1 through 29 above as if restated verbatim herein below.

31.

Pursuant to O.C.G.A. §9-11-65(b), “A temporary restraining order may be granted without written or oral notice to the adverse party or his attorney only if:

1. It clearly appears from specific facts shown by affidavit or by the verified complaint that **immediate and irreparable injury, loss, or damage will result** to the applicant before the adverse party or his attorney can be heard in opposition; and
2. The applicant’s attorney **certifies** to the court, **in writing, the efforts**, if any, which have been made to give the notice and the reasons supporting the party’s claim that **notice should not be required.**” (Emphasis Added).

***Immediate and Irreparable Harm***

32.

As stated herein above, Wong has systematically misused Legacy PAC online assets intentionally to cause harm to the functionality, fundraising efforts and to injure the reputation of Legacy PAC. Wong’s continued unauthorized misuse of Legacy PAC assets has and continues to cause immediate and irreparable injury.

***Efforts to Notify Defendant and Reasons Notice Should not be Required***

33.

Prior to filing this action, Legacy PAC attempted to negotiate a private resolution with Wong through her attorneys and specifically demanded that Wong cease using its online assets and to surrender her access and control. A copy of the demand letters and Wong never complied with any demand, and continued her unauthorized use of the online assets for her purposes and denied Legacy PAC access and use of its property, the online assets.

*Notice of Associated and Parallel Action*

34.

There is a parallel action filed by L-Strategies in this Court (Coweta County Superior Court Civil Action No. SUC2023000784) concerning Wong's embezzlement, fraud, breach of duty/loyalty and defamation of L-Strategies, LLC a political consulting business filed June 30, 2023. The members of L-Strategies, LLC were Jared B. Craig, Esq., Stan Fitzgerald, and Angie Wong until May 30, 2023. In that action, Wong has dodged service in her home state of Florida, at her alternative real properties located in New York, and during political events she was to attend in New Jersey. Wong's Miami residence has a doorman that prevents direct access



to her unit(s) in that building. Craig and Fitzgerald have expended approximately \$1,250.00 in failed service attempts. Because the parties here and the parties in that action are comprised of the same people, and the misconduct in both actions are closely aligned, Legacy PAC believes Wong will attempt to dodge personal service of this action and any temporary injunction.

35.

Legacy PAC seeks an immediate temporary injunction to cease Wong's continued unauthorized misuse of its online assets as to preserve those assets for their proper use by authorized users. Wong's continued exclusive access and control over the online assets illustrated herein is causing continual harm to Legacy PAC on a daily basis.

**COUNT 5: ATTORNEY'S FEES AND LITIGATION EXPENSES**

36.

Legacy PAC restates the averments contained in paragraphs 1 through 35 as if restated verbatim herein below.

***O.C.G.A. § 13-6-11: Defendant Acted in Bad Faith***

37.

**O.C.G.A. § 13-6-11: Expenses of Litigation:** states, “*The expenses of litigation generally shall not be allowed as a part of the damages; but where the plaintiff has specially pleaded and has made prayer therefor and where the defendant has acted in bad faith, has been stubbornly litigious, or has caused the plaintiff unnecessary trouble and expense, the jury may allow them.*”

38.

In this action, Wong has systematically acted in bad faith prior to Legacy PAC members’ discovery of her misconduct, lost access and control of Legacy PAC online assets, and statements that injured the reputation of Legacy PAC. Thereafter, Wong continued to systematically act in bad faith after receiving the *Demand Letter* dated June 7, 2023 demanding that Wong cease and desist from current and future unauthorized use of Legacy PAC online assets. Wong continues to defame Legacy PAC, and wrongfully withholds control and possession of online assets. Prior to file this action, Legacy PAC acted in good faith to keep the controversy internal by removing any and all related comments on social media and websites, regardless of their truthfulness and accuracy. Wong, refused to cure her false and defamatory statements published online or communicated in

person whatsoever. As of the date of this filing, Wong continues to defame Legacy PAC and operate in bad faith.

39.

Legacy PAC petitions this Court for 100% of their attorney's fees due to Wong's bad faith and continuous misconduct as illustrated herein.

**O.C.G.A. § 9-15-14:**

**(a) Lacking All Justiciability; or (b) Lacking Substantial Justifications**

40.

**O.C.G.A. § 9-15-14: Attorney's Fees and Expenses of Litigation**

Where Attorney Brings or Defends Action Lacking Substantial Justification:  
states in relevant part as follows:

“a) In any civil action in any court of record of this state, **reasonable and necessary** attorney's fees and expenses of litigation shall be awarded to any party against whom another party has **asserted a claim, defense, or** other position with respect to which there existed such a **complete absence of any justiciable issue of law or fact** that it could not be reasonably believed that a court would accept the asserted claim, defense, or other position. Attorney's fees and **expenses so awarded shall be assessed**

against the party asserting such claim, defense, or other position, or against that party's attorney, or against both in such manner as is just.

(b) The court may assess **reasonable and necessary** attorney's fees and expenses of litigation in any civil action in any court of record if, upon the motion of any party or the court itself, it finds that an attorney or party **brought or defended an action**, or any part thereof, that **lacked substantial justification** or that the action, or any part thereof, was interposed for **delay or harassment**, or if it finds that an attorney or party unnecessarily expanded the proceeding by other improper conduct, including, but not limited to, abuses of discovery procedures available under Chapter 11 of this title, the "Georgia Civil Practice Act." As used in this Code section, "**lacked substantial justification**" means substantially frivolous, substantially groundless, or substantially vexatious." (Emphasis Added).

*Lacks Justiciable Issue of Law or Fact*

40.

O.C.G.A. § 9-15-14(a) would apply if Wong attempts to assert a defense that lacks any justiciable issue of law or fact. In this event, reasonable and necessary attorneys' fees and litigation expenses "**shall be**



**assessed against the party.”** In the event Wong attempts an improper defense, Legacy PAC seeks attorney’s fees.

***Misconduct of Party Lacks Substantial Justification***

41.

**O.C.G.A. § 9-15-14(b)** would apply if Wong’s conduct during the pendency of this case offends this Court or otherwise is calculated to cause delay, harassment or vexatious in nature, and said conduct lacks substantial justification. Violations of this subsection, grant broad discretion to a trial court judge to award attorney fees and litigation expenses when appropriate.

42.

Plaintiff Corporation petitions this Court for attorney’s fees and litigation expenses in the event Wong offends subsection (a) or (b) of **O.C.G.A. §9-15-14.**

WHEREFORE, Plaintiff prays:

- (a) That Defendant be served according to law;

- (b) That a hearing be scheduled pursuant to a Rule Nisi to allow Defendant, Wong, the opportunity to appear and state why Plaintiff Corporation is not entitled to the relief the seek herein;
- (c) That this Court award Legacy PAC with **\$22,500.00** in compensatory damages arising from Wong's Tortious Interference with Business Activities referenced in in Count 1 of this Petition;
- (d) That this court award Plaintiff Corporation with **\$50,000.00** in compensatory damages arising out of Wong's false and defamatory statements referenced in Count 2 herein;
- (e) That this Court award Plaintiff Corporation with in punitive damages in an amount that this Court deems just and reasonable in light of Wong's systematic intentional misconduct and continuous acts of bad faith as set forth herein;
- (f) That this Court GRANT Legacy PAC with and Order for **Immediate Injunctive Relief** that enjoins Wong's future use of Legacy PAC online assets and to transfer access and control to Legacy PAC;

- (g) That this Court award **equitable relief** by ordering Wong to communicate the **full extent of defamation** orally or in writing, direct her to recant or otherwise retract said statements;
- (h) That this Court award **attorney's fees and litigation expenses** pursuant to any of the statutory basis included herein, or in the event Wong's conduct offends this Court during the pendency of this action; and
- (i) For such other relief as this Court deems just and equitable.

This the 18 day of November, 2023.

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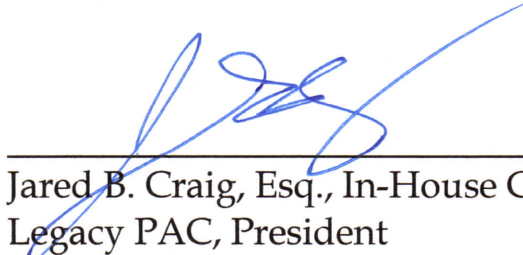
/s/ Jared B. Craig, Esq.  
Jared B. Craig, Esq., In-House Counsel  
Legacy PAC, President  
Georgia Bar No. 940430

STATE OF GEORGIA

COWETA COUNTY

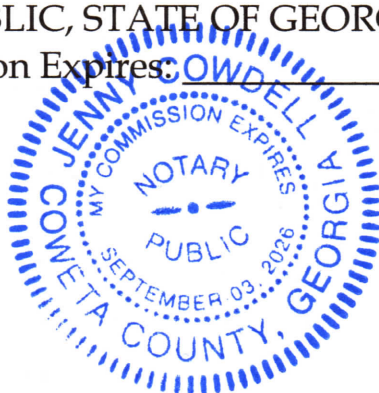
VERIFICATION

Personally appeared before the undersigned attesting officer duly authorized to administer oaths, **Jared B. Craig, Esq.**, who on oath, deposes and states that the information contained in the foregoing *Amended Petition for Tortious Interference with Business, Defamation/Libel, Conversion of Property, Trover, Motion for Immediate Temporary Protective Order/Injunction, and Attorney's Fees* is true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Jared B. Craig, Esq., In-House Counsel  
Legacy PAC, President

Sworn to and subscribed  
before me this 18th day of November, 2023.

  
\_\_\_\_\_  
NOTARY PUBLIC, STATE OF GEORGIA  
My Commission Expires: \_\_\_\_\_







**VIA ELECTRONIC MAIL**

Office of General Counsel  
Federal Election Commission 1050 First Street, NE Washington, DC 20463  
*EnfComplaint@fec.gov.*

CC:  
Caitlin P. Contestable  
Direct: (678) 940-1050  
[ccontestable@ChalmersAdams.com](mailto:ccontestable@ChalmersAdams.com)

**Re: Demand for the closing of America First Legacy PAC**

June 30, 2023

Dear Federal Election Commission,

I am writing to report America First Legacy PAC ("Legacy PAC") located at 95 White Bridge Rd, Set 207, Nashville, TN 37205, EIN: 92-0556009. The original complaint was sent via email to *EnfComplaint@fec.gov* on July 29, 2023.

I am President of America First Legacy PAC and I had recently learned my former associates removed me from the PAC's bank account by alleged fraudulent means. The organization does not have bylaws that govern the PAC or held any official meetings with my presence or knowledge to remove me as President of Legacy PAC. Fraudulent documents were submitted to the bank to remove me as a signer at Security Banks and Trust (TN), which I learned of days ago via phone conference with the bank. The bank requires written meeting minutes and signatures of all board members to remove any signers on the PAC account. I am on the board as the President, and I did not sign any meeting minutes related to my removal as President. My lawyers have asked Stan Fitzgerald and Jared Craig through their legal representative for written meeting minutes related to this matter; we were told none exists.

I am reporting Stan Fitzgerald, Donna Fitzgerald, Jared Craig and others for illegally operating a PAC and for related bank fraud.

In 2000, Stan Fitzgerald and Donna Fitzgerald were indicted in one of the largest consumer fraud cases by the FBI named Operation Bullpen. The investigation uncovered \$100M worth of fraud involving a nationwide forgery ring run by the Fitzgeralds. I did not learn of this operation until June 2023. Upon my discovery, Stan Fitzgerald starting putting out over 20 false and defamatory statements online and press releases in the media I had "stepped down" as President in a public effort to try to remove me from the PAC.

Stan Fitzgerald, Donna Fitzgerald, Jared Craig and others are also accused of defrauding donors with another political organization named Veterans for America First / Veterans for Trump. They used a dissolved 501c4 organization that to date has no registration or EIN, then they routed donations from Donorbox websites to private LLCs they had access to in at least six states. It is alleged they were selling services through L Strategies, a Georgia based LLC, to create fake Veterans organizations to solicit charitable donations across at least six states including VA, FL, GA, CT, TX and others.

In June 2023, I had discussed with Troy Brewer, the PAC's treasurer, to shut down the PAC. He mentioned he would close America First Legacy PAC after completing the following filing quarter of June 30, 2023. All expenses and final accounting were tallied. Then Troy disappeared.

I am writing to the FEC to officially shut down America First Legacy PAC due to the unethical actions by my former partners.

The foregoing is not intended as a complete recitation of all the facts and circumstances in this matter and is written without prejudice to any of my rights or remedies, whether legal or equitable, all of which are hereby expressly reserved.

Very truly yours,  
Ms. Angie Wong



STATE OF FLORIDA COUNTY OF Miami-Dade  
The foregoing instrument was acknowledged before me  
via ☒ physical presence or ☐ online notarizations  
This 5 day of July, 2023  
By Angie Wong  
Personally known OR produced identification ☒  
Type of Identification Produced FL Driver License  
NOTARY NAME HERE Ramon Vargas Notary Public  
My commission expires 03/11/2025

cc: by email  
cc: by registered mail



Ramon Vargas  
Notary Public  
State of Florida  
Comm# HH103782  
Expires 3/11/2025

Angie - Wong @ USA . com

917 346 4600





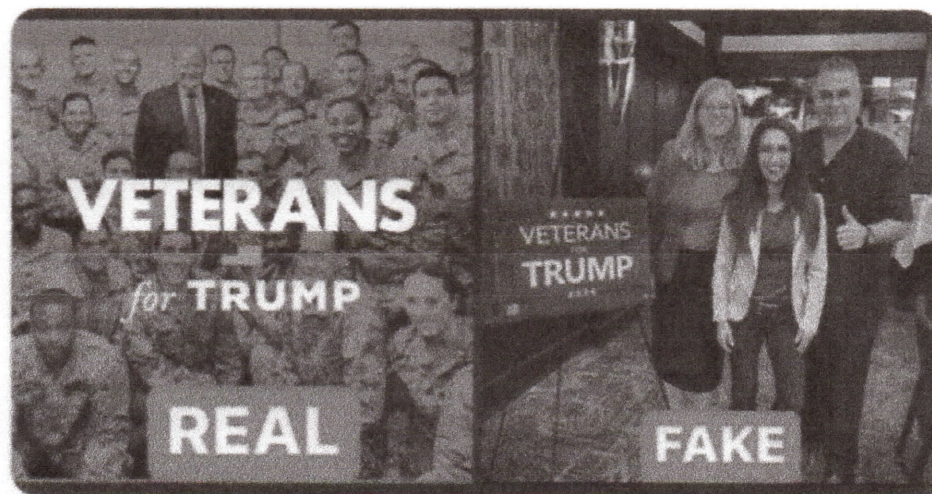
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**Angie Wong** ✓ @angiewong · Aug 21 · 🌐

...

Bedminster, NJ — President Donald J. Trump will grant the right to use his “Seal of Approval” to an exclusive group of candidates and committees that the President endorses or otherwise supports. The purpose of the Seal is to help President Trump’s donors distinguish between... Show more



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🔄 Angie Wong reposted



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EXHIBIT

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9:30

5G 93



↻ Real America's Voice (RAV) Retweeted



**Faith & Freedom** @FaithandFree... · 15m ...

#RTM2023 day two is underway! Speaking now is Alveda King.



**Angie Wong** @angiewong · 16m ...

When I discovered my former partners and associates were involved in alleged fraudulent activities, I reported it to my lawyers and the authorities under oath and punishable by laws of perjury.

Rich that these scammers are now accusing me of the crimes they're being...

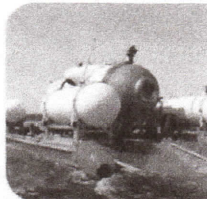
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**Real America's Voice (RAV)** @R... · 30m ...

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Steve Loeb

Aug 30, 2021

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